

Policy Guide for Pre-Employment Transition Services

Revised: July 2020

Purpose

This policy serves as guidance to Division of Vocational Rehabilitation (DVR) staff and describes statewide service provision to students with disabilities, specifically regarding pre-employment transition services (Pre-ETS), and to youth with disabilities, specifically regarding limitations on subminimum wage employment (Section 511). This guide also contains policy on providing Pre-ETS to potentially eligible students as defined by the Workforce Innovation and Opportunity Act, or WIOA.

Rationale

WIOA was signed into law on July 22, 2014. Title IV of WIOA reauthorizes the Rehabilitation Act of 1973 and its amendments. This legislation created significant changes requiring vocational rehabilitation (VR) programs to spend 15 percent of their annual budgets on the provision of required Pre-ETS to students with disabilities, including potentially eligible students. Students provided Pre-ETS in collaboration with local schools following the Individual with Disabilities Education Act (IDEA) will be better prepared for employment success upon completion of an educational program.

Additionally, VR programs have responsibilities to limit the flow of youth with disabilities into work settings where they are paid less than minimum wage (employer use of a subminimum wage license, a 14c holder) and to provide opportunities for competitive, community-integrated employment.

Background

Wisconsin DVR has a strong history of working with students with disabilities and working collaboratively with schools on students' transition goals. We have many resources for staff working with students and youth with disabilities who want to find competitive and integrated employment. Since WIOA's inception, Wisconsin's VR program has worked to follow the requirements set forth by WIOA.

WIOA Student/Youth Descriptions

- Pre-Employment Transition Services include (see section on Pre-ETS for more information):
 - Job exploration counseling
 - Work-based learning experiences
 - Counseling on opportunities for enrollment in comprehensive transition or postsecondary education programs at institutions of higher learning
 - Self-advocacy instruction including peer mentoring
 - Workplace readiness training
- A student with a disability is an individual who:
 - Is in high school or post-secondary education training program
 - A consumer is considered a student during the time periods between school years
 - See the section on tracking Pre-ETS expenditures for examples
 - Is 14-21 years old (has not yet reached 22nd birthday)
 - Has an Individualized Education Plan (IEP), a 504 Plan, or a documented disability

- For individuals ages 14-21, education training programs meeting eligibility requirements for being considered a student include:
 - High school or secondary education, including home school and alternative programs, with individuals still considered students during summers between school years
 - Adult basic education program leading to a recognized credential, e.g., GED or HSED or Post-secondary programs within technical college and university systems and programs approved by the Wisconsin Higher Education Board
 - State, national, or industry-recognized certification programs leading to a credential, e.g., certified nursing assistant (CNA), commercial driving license (CDL), Microsoft certification
- Enrollment in education/training programs will be documented in a DVR consumer's IRIS case management system file under the Education/Training tab. Measurable skills gains and credentials will be recorded.
 - [Credential Policy Guide](#) and [Measurable Skills Gain Policy Guide](#)
- Youth with a disability is an individual who:
 - Has a disability, not younger than 14 years old and not older than 24 years old
 - A youth who is not a student may receive services similar to Pre-ETS, but general service codes would be used, e.g., use of general code for vocational assessment (021), use of general code for a Skills to Pay the Bills class (057)

Provision of Pre-ETS

- DVR will make Pre-ETS available to all students with disabilities who are eligible or potentially eligible for DVR services.
- DVR will make every effort to provide or coordinate Pre-ETS services to ensure statewide availability.
- DVR staff will review and discuss Pre-ETS options with each student and determine which services will be provided to address the student's needs.
- DVR will provide and coordinate Pre-ETS collaboratively with local education agencies/high schools. See the [Transition Action Guide - Long Version](#) for more information.
- Pre-ETS may be provided:
 - Directly by DVR staff.
 - Through DVR's contracted service providers.
 - Through use of statewide services, e.g., student work-based learning service, vocational evaluation, and other statewide technical specifications.
 - Through the development of new service structures that incorporate Pre-ETS.
- Pre-ETS will be documented in the IRIS case management system through case notes and fiscal summary documentation.
- Students with disabilities who are eligible for DVR can also receive services that are not considered Pre-ETS as necessitated by the Individualized Plan for Employment (IPE) goal and in accordance with DVR policies.

Pre-Employment Transition Services (Pre-ETS)

Pre-employment transition services include the following:

- Job Exploration Counseling
 - Can be provided to an individual or to a group in a classroom or community setting
 - Provides industry, occupation, and labor market information to help a student identify a career path
 - Can include, but not limited to:
 - Vocational counseling and guidance
 - Assessments to help in understanding disability and employment, e.g., vocational interest inventories and benefits evaluations,
 - Informational interviews
 - Supportive services of transportation and personal assistance services can be provided as Pre-ETS if needed to support job exploration counseling (See page 5)
 - Auxiliary aids/services to support job exploration counseling (See Page 5)
 - [Fiscal Account Codes](#) and [Pre-ETS Quick Desktop Reference Guide](#)
- Work-Based Learning Experiences
 - Real-life work experiences, provided in an integrated setting to the maximum extent possible, where students can apply/develop academic, technical, and employability skills
 - Can include, but not limited to:
 - Job shadows
 - Internships/temporary work experiences including wages
 - DVR's student work-based learning services for short-term jobs (not for long-term IPE goal)
 - Student on-the-job training, Wisconsin LTE program, and/or apprenticeships
 - Parts of the Project SEARCH program – monthly skill instruction and the job plan
 - Supportive services of systematic instruction, transportation and personal assistance services can be provided as Pre-ETS if needed to support work based learning services (See Page 5)
 - Auxiliary aids/services to support work-based learning (See page 5)
 - [Student Work Based Learning Services Technical Specification](#)
 - [Fiscal Account Codes](#) and [Pre-ETS Quick Desktop Reference Guide](#)
- Counseling on opportunities for enrollment in comprehensive transition programs or postsecondary education programs, which can include, but are not limited to:
 - Exploring the academic and occupational trainings needed to succeed in the workplace
 - Post-secondary opportunities associated with career fields or pathways
 - Self-advocacy skills for identifying accommodations/services in an educational program and providing resources that may be used to support individual student success in education and training (i.e., disability support services)
 - Advising students and parents or representatives on academic curricula and course offerings

- Providing information about college application and admissions processes and financial aid information
 - Supportive services of transportation and personal assistance services can be provided as Pre-ETS if needed to support this counseling (See page 5)
 - Auxiliary aids/services to support this counseling (See page 5)
- [Fiscal Account Codes](#) and [Pre-ETS Quick Desktop Reference Guide](#)
- Workplace Readiness Training - Development of social skills and independent living skills necessary for employment. Can be provided generally in a classroom setting or tailored to an individual's needs within a training program provided in an educational or community setting.
 - Can include, but not limited to:
 - Learning communication and interpersonal skills
 - Understanding employer expectations for punctuality and performance, appropriate behaviors and dress as well as other “soft” skills necessary for employment, e.g., Skills to Pay the Bills classes
 - Financial literacy, including benefits planning services
 - Orientation and mobility skills to access workplace readiness training or to learn to travel independently
 - Job-seeking skills
 - Supportive services of transportation and personal assistance services can be provided as Pre-ETS if needed to workplace readiness training (See page 5)
 - Auxiliary aids/services to support Workplace Readiness Training (See page 5)
 - [Fiscal Account Codes](#) and [Pre-ETS Quick Desktop Reference Guide](#)
- Self-advocacy which may include peer mentoring - Instruction may be conducted in generalized classroom settings or as an arrangement of individual opportunities.
 - Self-advocacy can include, but is not limited to:
 - Learning about rights and responsibilities
 - Learning how to request accommodations, services, or supports
 - Mentoring with education staff, e.g., principals, nurses, teachers, or office staff.
 - Peer mentoring with individuals employed by or volunteering for employers, e.g., boards, associations, or organizations in integrated community settings
 - Youth leadership activities offered in educational or community settings
 - Counseling and information provided by DVR counselors related to self-advocacy topics
 - Supportive services of transportation and personal assistance services can be provided as Pre-ETS if needed to support self-advocacy (See page 5)
 - Auxiliary aids/services to support self-advocacy (See page 5)
 - [Fiscal Account Codes](#) and [Pre-ETS Quick Desktop Reference Guide](#)

The supportive services of systematic instruction, transportation and personal assistance can be provided in conjunction with and in supportive of the 5 core Pre-ETS categories of services:

- These supportive services must be in an approved IPE.
- Must support another Pre-ETS being provided.
- Pre-ETS coding for these services would be used.
- Transportation and personal assistance services can be used to support all 5 core Pre-ETS categories of services.
- Systematic instruction could be used to support the core Pre-ETS category of work based learning experiences.
- These supportive services are not available to Potentially Eligible students.

Auxiliary aids/services can be provided to support participation in Pre-ETS for students with sensory and/or communicative disabilities, impairments, or barriers:

- Students who have vision, hearing, or other communicative disabilities use different methods to communicate.
- DVR will ensure that no qualified student with a disability is denied the benefit of pre-employment transition services based on their disability, impairments, or barriers. Therefore, if a student requires auxiliary aids/accommodations to access or participate in any of the required Pre-ETS, DVR may pay for such costs when **no other public entity** is required to do so.
- Auxiliary aids and services may include:
 - Interpreter and note-taking services
 - Telephone handset amplifiers or telephones compatible with hearing aids
 - Assistive listening devices/systems
 - Open and closed captioning, including real-time captioning
 - Other effective methods of making aural information available to individuals who are deaf or hard of hearing
 - Qualified readers, taped texts, audio recordings, and braille or large print materials
 - Screen readers or magnification software
 - Other effective methods of making visually-delivered materials available to individuals who are blind or have low vision
 - Taking more time to communicate with someone who uses a communication board
 - Student permission to provide feedback in a written format
- Auxiliary aids and services **do not** include:
 - Personal devices (e.g., computers, laptops, tablets, etc.)
 - Prescribed devices (e.g., eyeglasses, hearing aids, wheelchairs)
 - Readers for personal use or study
 - Home or vehicle modifications
 - Attendant care or other services of a personal nature
- Auxiliary aid examples:
 - If a student is blind and needs screen reader software installed on a computer to participate in a work experience, the software would be considered a Pre-ETS auxiliary aid for workplace readiness, but the computer would not be considered an auxiliary aid.

- A student who has a speech impediment may need more time to express themselves or may need to be allowed to provide their feedback in a written format.
- A student who is deaf may need access to an interpreter to participate in a Skills to Pay the Bills class.
- A student who has limitations due to paralysis may require a hand brace in order to grip a stylus to type on a computer keyboard for a temporary work experience.
- Assistive/rehabilitation technology assessments to determine whether modified equipment or devices are needed for a student to participate in Pre-ETS can be provided, but this assessment is not considered a pre-employment transition service. Therefore, if the student has a potentially eligible case record this assessment **may not** be provided.
- Assistive/rehabilitation technology training may be provided, but this training is not considered a pre-employment transition service. Therefore, if the student has a potentially eligible case record this assessment **may not** be provided.
- If a student will need a great deal of assistive technology due to disability, it may be best for this student to have a regular DVR case record and not a potentially eligible case record.

Tracking Pre-ETS Expenditures

- Pre-ETS provided to a student count toward DVR's 15 percent expenditure requirement.
- DVR has created service codes specifically to document and track Pre-ETS.
 - Pre-ETS Codes 201-236
 - Each code rolls up into one of the five required Pre-ETS defined by WIOA.
- Pre-ETS codes are used when staff authorize purchase orders in the IRIS case management system for Pre-ETS to students with disabilities.
 - Use of Pre-ETS codes for expenditures must end the day the consumer turns 22 or is no longer enrolled in an education program, whichever comes **first**.
 - Students may have a regular DVR case or a potentially eligible case.
 - A consumer is still considered a student during the time periods between school years, e.g., summer between grades 11 and 12, or summer after high school graduation prior to college program beginning in the next fall semester.
- DVR's reporting system, Dashboard, helps track Pre-ETS expenditures and numbers of students per WDA and individual DVR counselor.
- [How to Handle Pre-ETS Codes on POs Past Age 21](#)

DVR Staff Providing Pre-ETS Directly

- Pre-ETS can be provided directly by DVR, which will help meet the 15 percent expenditure requirement.
- Direct provision of Pre-ETS by DVR staff is considered an in-house service and should be documented as such through the case noting process in IRIS. For more information on this topic, see the [In House Service and Comparable Benefits Policy Guide](#).
- Direct services are tracked through the coding of staff time in the payroll system, HCM.
 - Each DVR WDA has a specific Task Profile ID code to use for Pre-ETS provision.

- [Guide for Coding Pre-ETS time in HCM](#)
- Typically, DVR staff directly provide Pre-ETS in the categories of:
 - Job exploration counseling
 - Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs
- Travel time to attend meetings where Pre-ETS are provided by DVR staff can also be tracked as Pre-ETS time in the payroll system, HCM.
- Common Examples include, but are not limited to:
 - Counseling and/or discussions related to career pathways, labor market information, or training and education programs during IEP meetings for any student, regardless of DVR application status
 - Talking to small groups of students or attending school conference meetings
 - Counseling centered around soft skills for employment and self-advocacy
 - Review of a vocational assessment with a student
 - Directly setting up a job shadow, company tour, informational interview (no DVR service provider involvement)
 - Assistance with job search activities and resume development
 - Travel time to attend appointments where Pre-ETS will be provided by DVR staff
 - Time associated with the discussion and coordination of Pre-ETS for individual students, e.g., coordinating with the high school on how a student will participate in a job shadow, vocational assessment, or several students attending a Skills to Pay the Bills class
- Administrative tasks are not considered staff directly providing or coordinating Pre-ETS. This means that time spent generating a purchase order for a pre-employment transition service, for example, **may not** be tracked as Pre-ETS time in the payroll system.

Outreach and Coordination Activities

- DVR staff at all levels will make every effort to develop and maintain cooperative working relationships with state and local secondary education staff, post-secondary education staff, workforce development partners (e.g., Workforce Development Centers), and other vocational service providers to coordinate pre-employment transition services.
- Outreach and Coordination activities include, but are not limited to:
 - Participating in Individualized Education Program (IEP) meetings for eligible, not yet eligible, and potentially eligible students. Participation may be in person or by teleconference, when invited, pending DVR staff availability.
 - Attending person-centered planning meetings for students receiving services through long-term support programs, e.g., Family Care and IRIS.
 - Encouraging referral sources to refer students with disabilities in secondary education at least two years prior to high school exit or earlier as outlined in the Transition Action Guide (TAG).
 - Assigning DVR Counselors as liaisons and points of contact for each public high school in Wisconsin.

- Providing accurate information to referral sources, students, and families regarding the referral and application process for vocational rehabilitation services and information regarding Pre-ETS.
- DVR staff attending local transition group meetings, e.g., Transition Action Councils (TAC) or County Communities on Transition (CCoTs).
- Working with other WIOA Programs and employers to develop work-based learning experiences for students with disabilities.
- School officials continue to be responsible for providing a free and appropriate public education to include transition services required under IDEA.
- [DVR/DPI/DHS Interagency Agreement](#) and [Transition Action Guide - Long Version](#)

Referrals/Applications of Students Applying to DVR (Regular Case Record)

- High school students should refer themselves to DVR about two years prior to high school exit, or earlier based on individual needs/situations.
- DVR staff, the student, and the student's guardian will determine whether Pre-ETS would be best provided through a potentially eligible DVR case record or a regular DVR case record. In either case, parent/guardian approval is needed and, if applicable, guardianship paperwork is obtained and attached to the case record in IRIS.
- Students with disabilities are not exempt from any of the order of selection requirements for vocational rehabilitation services. A student with a disability who needs individualized VR services, in addition to Pre-ETS, must apply and be determined eligible for the VR program and have an approved IPE.
- Process for a student in need of a regular DVR case record:
 - Students can fill out a paper or online [DVR Referral form](#)
 - Receive information about DVR through a local DVR orientation session or a one-on-one meeting with a DVR staff person
 - Complete DVR application and eligibility process
 - Develop the IPE
 - Full array of VR services can be provided, including Pre-ETS

Potentially Eligible Students and Process (Potentially Eligible Case Record)

- A potentially eligible (PE) student is an individual who meets the definition of a student with a disability **and** has not previously been determined eligible or ineligible for DVR.
- Provision of Pre-ETS for a PE student must end on the student's 22nd birthday or when the student is no longer enrolled in an education program.
- PE cases do not follow the regular DVR application, eligibility, or IPE development process.
- PE student may only receive Pre-ETS services EXCEPT FOR systematic instruction, transportation, and personal assistance.
- Examples of when to use the potentially eligible designation include, but not limited to:
 - When needed to expedite the provision of Pre-ETS, e.g., a workplace readiness class is starting, and a student would like to participate.

- When a student does not want to formally apply for a regular DVR case record and only needs the Pre-ETS that can be offered to a PE student
- When DVR has developed a specialized agreement with another entity to assist in the provision of Pre-ETS.
- The process for a student in need of a potentially eligible case record is as follows:
 - [Potentially Eligible Guidance](#)
 - Student completes the [Potentially Eligible Referral form](#) and returns it to DVR. This is currently a paper form entered into the IRIS case management system by DVR staff.
 - School staff can sign off on the PE form to verify disability status, or disability documentation can be submitted to DVR.
 - Application, eligibility, and IPE processes are not followed for PE students.

Student and Youth Requirements for Section 511

- WIOA limits the use of subminimum wage employment for both students and youth with disabilities ages 14-24.
 - A student or a youth who is 24 years old or younger may not work for subminimum wage without first applying for DVR services and being provided vocational services, including but not limited to Pre-ETS, to determine if competitive integrated employment is possible.
- Note:** These requirements do not apply for a student or a youth who is pursuing other options such as Day Services programming.
- If a student or youth is known to DVR to be seeking subminimum wage, DVR staff will inform them of the requirements of WIOA.
 - [511 Guidance for Youth](#)

Writing the Individualized Plan for Employment (IPE) for High School Students

- The IPE should be completed prior to high school exit for a student determined eligible for DVR services and not under an order of selection wait list.
- The IPE goal and appropriate services should be coordinated with a student's Individualized Education Plan (IEP) or 504 plan and include the provision of Pre-ETS.
- High school attendance and completion should be listed as a service on the IPE.
- IPE should be developed within 90 days or with an extension that is documented in the IRIS case management system and approved by DVR and the student.

Use of Projected Post-School Employment Outcome for IPE goal

- Not all students or youth with disabilities will know specifically what their employment goal will be, therefore a broader IPE employment goal may be used, e.g., skilled trades, information technology services, health services practitioner, etc.
- The IPE should outline services and activities that will guide career exploration.
- This broader IPE employment goal can be amended during the career exploration process and eventually revised to a specific vocational goal once this process is complete.

Best Practices for Working with Students

- Connect with the high school liaison and set up regular meetings to talk to students about applying to DVR and Pre-ETS.
- Set a day each month to meet with students one-on-one at the school.
- Keep parents/guardians informed.
- Attend transition fairs and events.
- Host a table at parent-teacher conferences.

DVR Resource Documents: Students and Youth with Disabilities

- [Fiscal Account Codes](#)
- [Pre-ETS Quick Desktop Reference Guide](#)
- [Student Work Based Learning Services Technical Specification](#)
- [How to handle Pre-ETS codes on POs past age 21](#)
- [Guide for Coding Pre-ETS time in HCM](#)
- [PE Request Form](#)
- [511 Guidance for Youth](#)
- [Transition Action Guide Long Version](#)
- [Transition Action Guide Short Version](#)
- [DVR/DPI/DHS Interagency Agreement](#)
- [Transition Improvement Grant website](#)
- [Coding Alignment Tool](#)
- [Potentially Eligible Guidance](#)
- DVR's Statewide Transition Resources and Action Team (START)
 - [START Information](#) and [START Member Listing](#)